

February 17, 2014

Ms. Bonnie Hriczko Removal Action Branch U.S. Environmental Protection Agency, Region II 2890 Woodbridge Avenue, MS-211 Edison, New Jersey 08837

RE: Request for Information Pursuant to Section 104 of CERCLA

Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

Dear Ms. Hriczko:

Enclosed with this letter is Lubrication Engineers, Incorporated's response to the above referenced information request. As indicated in our responses to the various requests, Lubrication Engineers did not transact any business or have any other involvement with Superior Barrel and Drum Company, Inc.

If you should have any questions to the information request, please feel free to contact me.

Sincerely,

Scott Schwindaman

President/CEO

Cc: Mr. William Tucker

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of Kansas:

County of Sedgwick:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

SCOTT A SCHIDUSDAMAN NAME (print or type)

TITI F (print or type)

Sworn to before me this day of 17, 2014

Motary Public



Lubrication Engineers, Inc. Response to Information Request

General Information about the Company

1. a. State the correct legal name of the Company.

Response:

Lubrication Engineers, Inc.

a. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.

Response:

State of Texas corporation

b. State the name(s) and address (es) of the officer(s) of the Company.

Response:

Scott Schwindaman, President & CEO – 1919 E Tulsa, Wichita, KS 67216

Jeffrey Turner, Executive Vice President – 300 Bailey Ave, Fort Worth, TX 76107

Patrick Kraus, Vice President of Administration - 1919 E Tulsa, Wichita, KS 67216

Vincent Tofani, Vice President of Sales - 300 Bailey Ave, Fort Worth, TX 76107

Darren Booth, Vice President of Manufacturing Operations - 1919 E Tulsa, Wichita, KS 67216

John Sander, Vice President of Technology - 1919 E Tulsa, Wichita, KS 67216

c. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address (es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

Response:

Alpha BioSystems, Inc.: 100% owned subsidiary of Lubrication Engineers, Inc. Eric Borland, President & CEO – 9912 W. York, Wichita, KS 67215 Terry Loucks, Executive Vice President of Technology - 9912 W. York, Wichita, KS 67215

Tim Galliher, Executive Vice President of Sales - 9912 W. York, Wichita, KS 67215

d. If the Company is a successor to, or has been succeeded by another, identify such other company and provide the same information requested above for the predecessor or successor company.

Response:

N/A

e. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.

Response:

No business conducted with Superior Barrel and Drum

2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

Response:

Lubrication Engineers, Inc. is a manufacturer of industrial and automotive lubricants. These products are shipped to our customer location in single trip containers. Container sizes range from pint bottles to 55 gallon drums. The customer takes possession and ownership of the lubricant and the container upon delivery. They are responsible for proper disposal of the container upon use of the lubricant.

b. Describe your Company's operations from 1974 to the present and identify all chemicals used or produced as a result of your Company's operations during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

Response:

Lubrication Engineers, Inc operates a manufacturing facility in Wichita, Kansas which produces both greases and oils in a blending operation. The main product used to produce the lubricants is mineral base oil received from refineries. Additives are introduced into the base oil to produce various products for industrial and automotive applications. We have produced an industrial cleaner known as Nutrigent that is aqueous based and contains sodium sulfonates, sodium phosphates, propylene glycol ether, phosphate esters and ethyl amine. We have no waste streams out of the production facility in Wichita. All waste product is sent to a re-refiner or used as a bunker fuel for energy recovery.

Company's Relationship to Superior Barrel and Drum ("SBD")

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

Response:

No business transactions with SBD can be identified either through company documents or other available information. Company records go back to 2000 and no transactions have been identified. Consistent with that document review, no transactions or other involvement with SBD is remembered by employees that would have had knowledge of such transactions prior to 2000. As indicated in our response to Request 2.a. above, the company would not have conducted business with SBD because the customer takes possession and ownership of the containers upon delivery.

a. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company;

Response: N/A. See response to Request 3.a. above.

b. Provide copies of any contracts or agreements between the Company and SBD;

Response: N/A. See response to Request 3.a. above.

1. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated;

Response: N/A. See response to Request 3.a. above.

a. State the name, address, and current RCRA Identification Number of each facility;

Response: N/A. See response to Request 3.a. above.

- 2. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.
 - a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;

Response: N/A. See response to Request 3.a. above.

b. Identify the number of Containers that were the subject of each such transaction;

Response: N/A. See response to Request 3.a. above.

c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.);

Response: N/A. See response to Request 3.a. above.

d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or from the Company to or from SBD, etc.)

Response: N/A. See response to Request 3.a. above.

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:
 - (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and

Response: N/A. See response to Request 3.a. above.

(2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

Response: N/A. See response to Request 3.a. above.

- 3. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.
 - Response: N/A. See response to Request 3.a. above.
- 4. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.
 - Response: N/A. See response to Request 3.a. above.
- 5. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:
 - a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and
 - Response: N/A. See response to Request 3.a. above.
 - b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;
 - Response: N/A. See response to Request 3.a. above.
- 1. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.
 - Response: N/A. See response to Request 3.a. above.
- 2. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.
 - Response: N/A. See response to Request 3.a. above.

3. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.

Response: Scott Schwindaman, Jeff Turner, Don Wharton. All of the named people were involved in determining if there were any documents or if other information indicating any type of business relationship between Lubrication Engineers, Inc. and SBD. No such documents or other information was identified, which is consistent with Lubrication Engineers' business practices as described above.

4. Identify any other person or entity (e.q., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title(s) and a description of the responsibilities.

Response: N/A. See response to Request 3.a. above and the response to the immediately preceding request.

5. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

Response: Lubrication Engineers, Inc. has no documents or information that may be helpful or useful to identify other sources who disposed of or transported Containers to the Site.



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CERTIFIED MAIL TO
וועבכ ותעם נחחה חמוכ זחחכ



RETURN RECEIPT

FIRST CLASS MAIL

Ms Bonnie Hriczko Removal Action Branch US Environmental Protection Agency, Region II 2890 Wood bridge Avenue, MS-211 Edison New Jersey 08837